

# Housing Hate Incident Policy

## Consultation report

### July 2025

## Executive Summary

- We would like to take this opportunity to thank everyone who shared their feedback and experiences as part of this consultation. Your responses have been so valuable in shaping the final policy and our plans for implementation.
- New Consumer Standards from the Regulator of Social Housing were introduced in 2024. As part of the Neighbourhood and Community Standard, the Council is required to publish a Hate Incident Policy outlining its strategy for preventing and addressing hate incidents impacting tenants and leaseholders in their homes and neighbourhoods. This includes people who live in our Seaside Homes and Temporary accommodation homes.
- We consulted with residents on a draft policy for Housing and this report explains what we did and sets out the results of the consultation.
- An 11 week public consultation on the draft policy ran from 9 September to 2 December 2024 via the council's online engagement platform, *Your Voice*.
- Your Voice meets international accessibility standards and offers surveys in the ten most spoken languages in Brighton & Hove. An Easy Read version of the survey, created by local organisation Speak Out, was available online and in hard copy. Additional accessible formats, including large print and phone-based survey options, were offered. The consultation was promoted through multiple channels and supported by two in-person events in October 2024, enabling meaningful participation across the community.
- We received 57 responses to the main online consultation survey on the draft policy and 9 responses to an additional survey on experience of reporting a hate incident to Housing.
- 91.2% of responses were from individuals and 8.8% of responses were on behalf of a group or organisation.
- Most of the proposals within the draft Housing Hate Incident policy received agreement.

- Agreement with each of the proposals by respondents to the consultation ranged from 53.4% to 73.4%. However, just 31.6% of respondents agreed that the council is doing enough to promote awareness of action Housing can take in response to hate incidents and a sizeable minority (21.1%) felt that it wasn't clear on how to report hate incidents.
- Although a small sample size, 44.4% of respondents to the additional survey on experience of reporting a hate incident, felt they were supported very badly throughout their case, with 66.7% reporting that they weren't helped to access relevant support organisations, such as Victim Support. Respondents also reported issues with communication, staff training and lack of action.
- In response to the consultation feedback, we plan to take forward the following actions:

#### **Improving Victim Support**

- We have increased staffing within the Tenancy Team in 2025.
- Action Plans for all hate incident cases, with a named contact and agreed communication preferences.
- Victims asked directly what outcomes they want.
- Referrals offered (e.g. Victim Support), with clear communication through updated standard letters and staff training.
- New senior oversight role to monitor consistency, review case closure surveys and conduct annual reviews of case outcomes.

#### **System & Staff Development**

- Upgrades to the Housing IT system to support action plans and improved categorisation of hate incident cases, enabling better oversight.
- Refresher training for all customer facing Housing teams.

#### **Awareness & Accessibility**

- Promote via case studies, community groups, posters, and newsletter [Homing In.](#)
- Improve online reporting visibility and LGBTQ+ links.
- Partner with SpeakOut Brighton to ensure accessible content for those with learning disabilities.

#### **Accountability & Enforcement**

- Victims informed of possible Housing actions, including legal routes.
- Enhanced staff training on explaining processes and gathering evidence.

#### **Advocacy & Clear Communication**

- Policy now highlights right to an advocate or representative.
- Templates and documents reviewed for accessibility.

### **Additional Measures**

- Clearer definitions of hate incidents vs. hate crimes.
- Explore providing incident reference numbers.
- Anonymous reporting via online reporting form.
- Updated response time within policy: we will aim to contact victims within one working day, not two.

It is expected that the final policy will be implemented in Winter 2025/6 following sign off.

## **1. Introduction**

[New regulatory standards for social housing](#) were introduced in April 2024, which set out the specific standards that registered providers, including the Council, must meet. Under the [Neighbourhood & Community standard](#), the council is required to publish a Hate Incident Policy clearly setting out our approach to how we deter and tackle hate incidents affecting council tenant and leaseholders where they live. This includes people who live in our Seaside Homes and Temporary accommodation homes.

In September 2024, we consulted with residents and stakeholders on a draft hate incident policy for Housing. This report summarises findings from the public consultation on the draft policy, which can be viewed [here](#).

The consultation focused on capturing residents' views on key areas highlighted by the Social Housing Regulator's Consumer Standards Code of Practice including, supporting affected residents, reporting, keeping residents informed and taking appropriate action.

The consultation ran for 11 weeks from 9 September to 2 December 2024. When the consultation closed, we had received 57 responses. 91.2% were from individuals, including 56.1% in council housing (including leasehold), 22.8% in private and owner occupied and 5.3% in temporary accommodation (including Seaside Homes)<sup>1</sup>. 8.8% responses were received on behalf of groups, networks and organisations, which included Sussex Police (Appendix E). Most responses were submitted online through Your Voice, the council's consultation platform and 2 responses received via in person sessions.

9 respondents opted to give further feedback on their experience of reporting a hate incident to Housing (2 via phone calls and 7 via an online survey).

Alongside indicating support for proposals within the draft policy, respondents gave feedback on Housing's response to persons harmed by hate incidents and ways

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<sup>1</sup> 15.8% of respondents chose not to answer tenure question

Housing can improve the policy and our response. We received many detailed responses, which have been summarised within section 3<sup>2</sup>. These reflect the views and opinions of those who responded to the consultation and do not represent the position or policies of the council.

Section 4 sets out the council's response to the feedback themes and identifies how we plan to take forward key issues. We are not able to respond to every point made within this report, but the responses received have been used to inform the final policy and shared with relevant council officers to improve our service.

Section 5 outlines the consultation process whilst section 6 details the next steps.

## **2. The consultation process.**

### **Developing the draft policy for consultation.**

The work to develop the draft policy was overseen by the Performance & Improvement Team led by the Head of Tenancy Services. Managers within Tenancy Services, Temporary Accommodation, the Community Safety Team and the ASB Officer for Temporary Accommodation were consulted and contributed to the draft policy.

Local organisations and stakeholders (listed in Appendix F) were invited to give initial feedback on Housing's response to hate incidents. Initial feedback from Victim Support and the Housing Strategy consultation, along with analysis of stage one complaints<sup>3</sup> (Appendix A) and Housing Ombudsman complaints were taken into consideration, along with advice from HQN (Housing Quality Network) who provided a copy of Notting Hill Genesis's policy as an exemplar example. Good practice and current legislative and regulatory requirements were also considered.

The Joint Housing Leadership Team reviewed the draft policy and agreed the consultation plans in August 2024, which was followed by a briefing to the Lead member for Housing.

In addition to supporting compliance with the consumer standards introduced by the Regulator of Social Housing, the draft policy aligns with the council's Anti-Racism Strategy and Equality Act 2010 obligations. The draft policy also aligns with the aims within the [Housing Strategy 2024 – 2029](#) to “*work with residents and our partners to develop safe, healthy and inclusive estates and neighbourhoods (4.1)*” and outcome 2 of the [Council Plan 2023 – 2027](#), to create a fair and inclusive city.

The draft hate incident policy builds upon the current service offer under the Tenancy Management [Anti-Social behaviour policy](#) with key additions to the following

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<sup>2</sup> Thematic analysis was undertaken with the support of the Your Voice artificial intelligence (AI) feature and moderated by members of the project group.

<sup>3</sup> A Stage 1 complaint is the first stage of the complaint procedure and aims for the relevant service team to; fully resolve the complaint and identify learning which will drive service improvement

areas: Scope, Additional measures to support victims, Senior oversight, Performance reporting, Staff training and awareness.

## **Formal consultation.**

The consultation on the draft policy was launched on 9 September 2024. This was done using our online consultation portal 'Your Voice' (with the option to provide responses via phone), we reached out to community groups and promoted the consultation on social media, displaying posters on our housing estates, in libraries, Bartholomew House and Hove Town Hall.

The project officer met weekly with a Community Engagement Officer to review progress and consider potential changes to the consultation approach. Based on feedback from Area Panel, two in person sessions were facilitated by the Community Engagement Team in October. The consultation was extended for a further three weeks (and closed on 2 December 2024) allowing for further communication to increase the response rate. This included targeted promotion of the lived experience survey amongst a sample of residents with a recently closed hate incident case.

## **Promoting the consultation.**

Allowing for duplication between the different mailing lists, over 100 groups and organisations were invited to take part in the consultation. In addition, they were asked to promote the consultation to their members, service users, staff and volunteers. All were sent reminders in October and November 2024.

An invitation to take part was sent to:

- 77 individuals and organisations on a core stakeholder list
- 49 individuals, groups and organisations on mailing lists held by the council's Community Engagement Team
- Link added to the Housing Online account homepage and an email with link sent to 4434 tenants without Housing Online account
- Text & emails to 1196 Temporary Accommodation & Seaside Homes residents
- Text to 485 Seaside Homes residents (sent by Seaside Homes Tenant Engagement Lead)
- Link to 'Tell us about your experience of reporting a hate incident to Housing' survey emailed and texted to a sample of 10 tenants who previously reported a hate incident

Other publicity:

- Emails to all Housing staff
- Article in the Autumn edition of Homing In magazine delivered to council tenants and leaseholders
- 100 posters were distributed for display on residents' noticeboards and Bartholomew House

- Social media on the Housing, Libraries and Community Engagement accounts
- Plasma screens in libraries and Hove Town Hall
- Area Panel meetings
- Annual Tenant conference
- Resident associations (via the Community Engagement Team)
- [Seaside Homes blog post](#)

## Accessibility.

The online survey was hosted on Your Voice, the council's consultation platform. The platform is compatible with international accessibility standards for web content. It also has the option for people to complete a survey in any of the 10 most spoken languages in Brighton & Hove.

Large print, hard copy surveys were available on request by email or phone. An Easy Read survey was produced for us by Speak Out, a local organisation with expertise in Easy Read. The guide was made available as hard copy and for download on Your Voice.

The option to complete the survey by phone was publicised via the Community Engagement Team, Homing In, Area panel meetings and targeted engagement to tenants. Two in person sessions were also held at Bartholomew House.

## 3. Consultation results

Overall, there was broad support for the draft policy, however a significant number of responses received highlighted areas of the policy respondents felt could be improved. These areas mainly concerned existing practices, such as the council's current webpages on reporting, and the current response of Housing to reports of hate incidents.

Respondents highlighted the need to ensure reporting a hate incident to Housing is clear and accessible, alongside improved information to ensure residents understand what a hate incident is. Responses also called for regular updates and communication with victims, tailored to their individual needs and preferences, in addition to referrals to support services including advocacy.

Several respondents emphasized the importance of taking action against perpetrators and ensuring that hate incidents have consequences. A significant proportion of respondents felt that the council is not doing enough to promote awareness of actions taken in response to hate incidents.

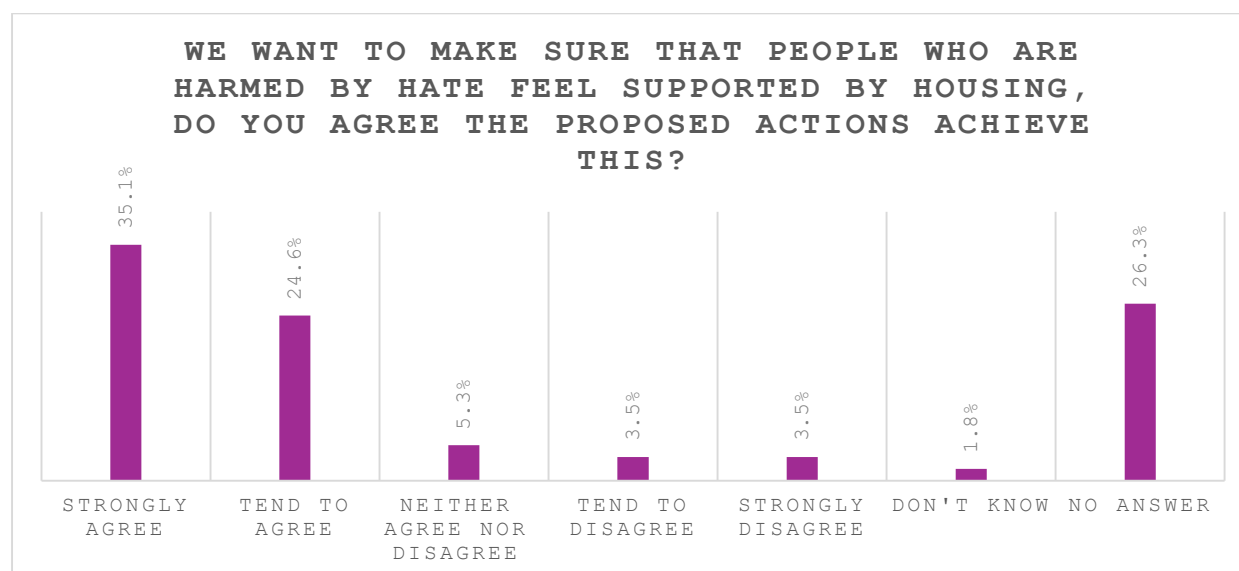
Several responses called for staff to receive training in dealing with hate incidents and to ensure staff are impartial, open minded and empathetic when dealing with cases.

Whilst some respondents had a satisfactory experience, a significant number of responses to the lived experience survey highlighted dissatisfaction with the current response to reported hate incidents and suggested ways for Housing to improve the handling of these cases. Respondents raised issues with staff training, communication, lack of action and indicated that many victims did not feel supported.<sup>4</sup>

A summary of the responses to each individual question within the main and lived experience surveys are set out in following sections 3.1 – 3.8, in addition to a summary of the in-person sessions (section 3.7). The full survey questions are included as appendices (Appendix B & C).

## 3.1 Supporting victims

We asked for views on 11 proposed supportive actions including meeting with the person harmed by hate within two working days of the first report at a location of their choice, arranging for a named officer to be a point of contact and arranging for repairs resulting from a hate incident to be completed as a priority.



### Support for proposals

Amongst those who responded to this question (42/57) there were high levels of support for the proposed actions (59.7% agree or strongly agree; 7.0% disagree or strongly disagree). However, a sizeable minority (28.1%) did not answer the question or said they didn't know.

### Suggestions on how Housing can improve

Just over half of the respondents (35/57) gave further feedback on how Housing can ensure people harmed by hate feel supported.

<sup>4</sup> Due to the small sample size, these results may not accurately reflect the experience of the majority of residents reporting hate incidents to Housing. However, the responses provide a valuable insight into the response by Housing.

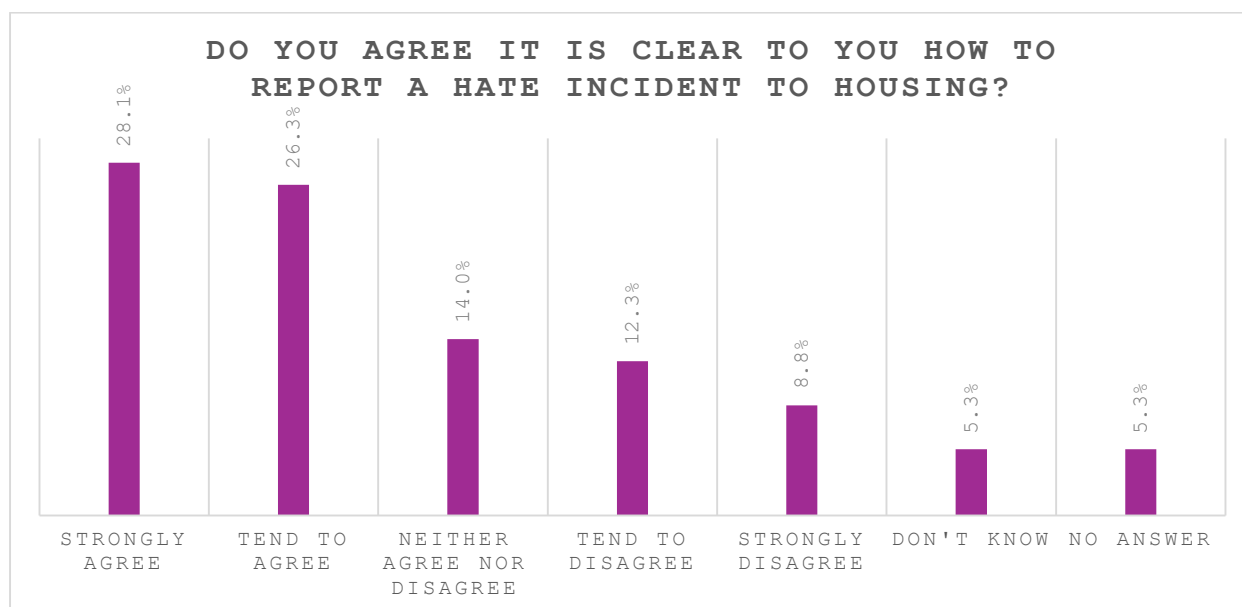
Question	Feedback
<p><b><i>Is there anything else you think we should offer to make sure people harmed by hate feel supported or do you have any further comments on supporting people harmed by hate?</i></b></p>	<ul style="list-style-type: none"> <li>• Victim centred approach adapted to the needs of the individual</li> <li>• Whilst the council may not always be able to deliver the victim's desired outcome, their voice should remain the centre of the process</li> <li>• Ongoing support and regular contact, with clear communication on the actions taken by Housing</li> <li>• Providing a named contact to help alleviate isolation often experienced by victims of hate</li> <li>• Consideration of an advocate</li> <li>• Referrals to appropriate support groups and where necessary, safeguarding referrals with the consent of the victim</li> <li>• Practical support, such as repairing damage like broken windows and providing free security cameras</li> <li>• Option of rehousing in severe cases</li> <li>• Listen to victim's communication preferences and offer alternatives to face to face meetings. An initial face to face meeting within 2 days of first report may feel like an interrogation</li> <li>• Asking the victim their views and explicitly what they want to happen</li> <li>• Ensuring staff are properly trained and officers are sensitive to the issues faced by victims of hate incidents</li> <li>• Staff to be aware that hate incidents can occur within minority groups and not to make assumptions about who might be a perpetrator or victim based on their group membership</li> <li>• Involving the police, either to ensure the victim reports the incident or to engage with the perpetrator and to</li> </ul>



	<p>consider the option of restorative justice</p> <ul style="list-style-type: none"> <li>• Ensuring staff are non-bias</li> <li>• Evict or move perpetrators and strict enforcement of rules</li> </ul>
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## 3.2 Reporting hate incidents to Housing

Respondents were invited to view relevant pages of the council website via a link to the draft policy [www.brighton-hove.gov.uk/housing/council-housing/tenancy-management-draft-hate-incident-policy](http://www.brighton-hove.gov.uk/housing/council-housing/tenancy-management-draft-hate-incident-policy) and feedback on how clear the information was.



### Support for proposals

Whilst most respondents (53.4%) agreed that it is clear to them how to report a hate incident to Housing, a sizeable minority (21.1%) disagreed.

### Suggestions on how Housing can improve

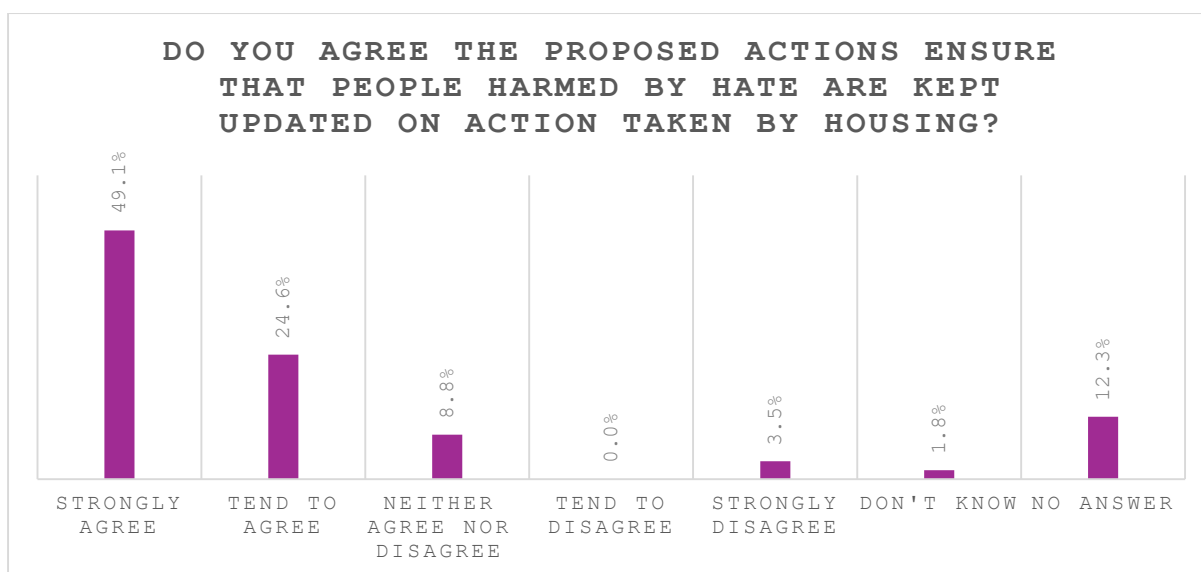
54/57 respondents answered this question and 29/57 gave suggestions on how Housing can make reporting hate incidents easier.

Question	Feedback
<i>Is there anything we can do to make reporting hate incidents to Housing easier?</i>	<ul style="list-style-type: none"> <li>• Improve awareness of what constitutes a hate incident &amp; hate crime, and how to report</li> <li>• Clearer definitions within policy, particularly the differences between a hate incident and hate crime</li> </ul>

	<ul style="list-style-type: none"> <li>• Dedicated and easily accessible reporting channel</li> <li>• A separate email address or freephone number specifically for hate incidents reports</li> <li>• Speaking to the same person about ongoing reports to ensure that important information is acted on</li> <li>• Accommodations for individuals with disabilities and where English is not spoken as a first language</li> <li>• Improvements to the council's webpages, including creating a clear support link on the homepage for LGBTQ+ individuals to report hate crimes and ensuring all links are functional</li> <li>• Written acknowledgement that incident has been logged</li> <li>• Housing to clearly communicate a zero-tolerance stance on hate incidents and to carry out regular visits to areas with reoccurring issues</li> </ul>
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### 3.3 Keeping residents informed

We asked for feedback on proposals to ensure that people who have been harmed by hate are kept informed by the case officer using their preferred contact method and agreed frequency of contact until the case is closed. By maintaining regular contact, it is proposed that the harmed person will be clear on what action will be taken and how long we think this will take.



## Support for proposals

Amongst those who responded to this question (50/57), the majority agreed the proposed actions would ensure that people harmed by hate are kept updated on actions taken by Housing (73.7% agree or strongly agree; 3.5% strongly disagree).

## Suggestions on how Housing can improve

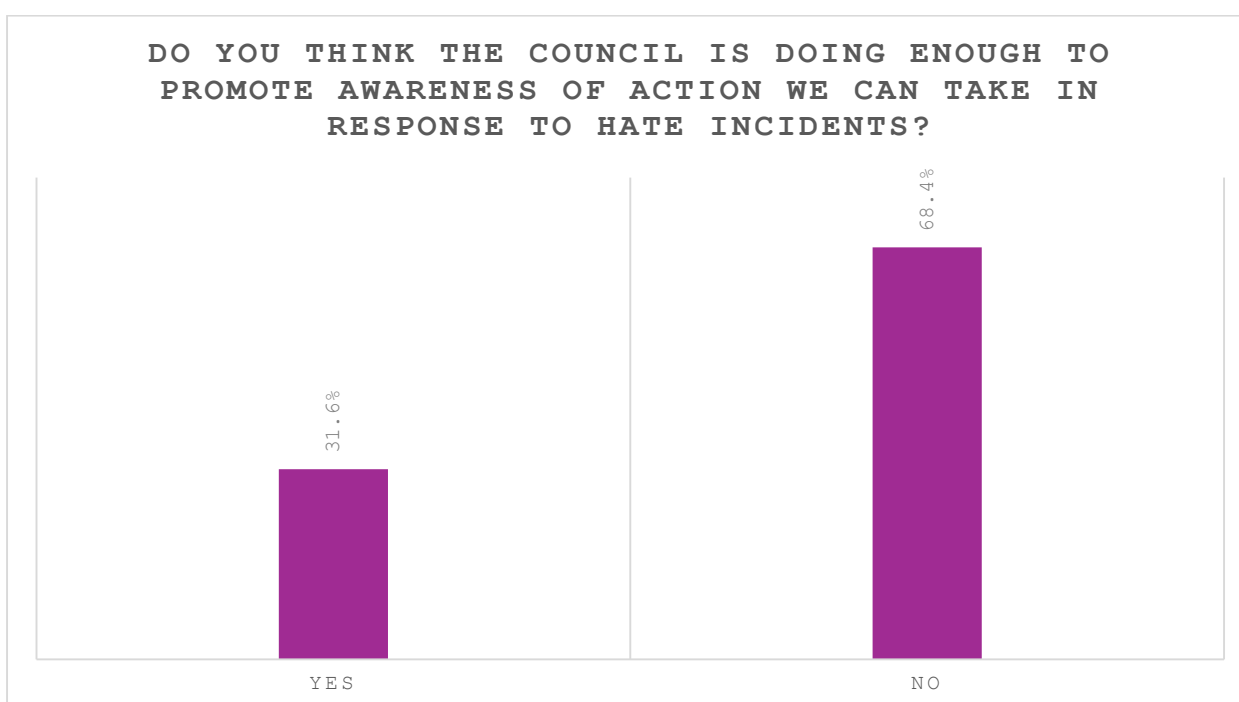
26/57 respondents gave further feedback on how we can improve communication with people harmed by hate on actions taken by Housing.

Question	Feedback
<i><b>Can you tell us more about how we can make sure that people harmed by hate are kept updated on actions taken by Housing?</b></i>	<ul style="list-style-type: none"> <li>• Regular and direct communication between Housing and those affected by hate incidents via text, phone calls and visits</li> <li>• Provide direct contact details of Housing Officers</li> <li>• Agreeing a victim contract on frequency and method of contact to set expectations</li> <li>• Tailor communication to individual's needs</li> <li>• Offer option of keeping a nominated representative, such as next of kin or support worker informed</li> <li>• Ensure Housing has sufficient resources to manage casework effectively</li> </ul>

	<ul style="list-style-type: none"> <li>• Ensure staff follow policies and act professionally</li> <li>• Timely action following reported incidents</li> </ul>
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### 3.4 Taking appropriate action.

Respondents were invited to give feedback on whether Housing is doing enough to promote awareness of action we take in response to hate incidents. A link to the draft hate incident policy was included, but it was made clear it was not necessary to read in order to answer the question [Tenancy management - draft hate incident policy](#).



### Support for proposals.

When asked whether they think the council is doing enough to promote awareness of action we can take in response to hate incidents, around two thirds of respondents answered 'No' (68.4%) rather than 'Yes' (31.6%). This question was answered by all 57 respondents, 24 of which gave further feedback on ways to improve awareness.

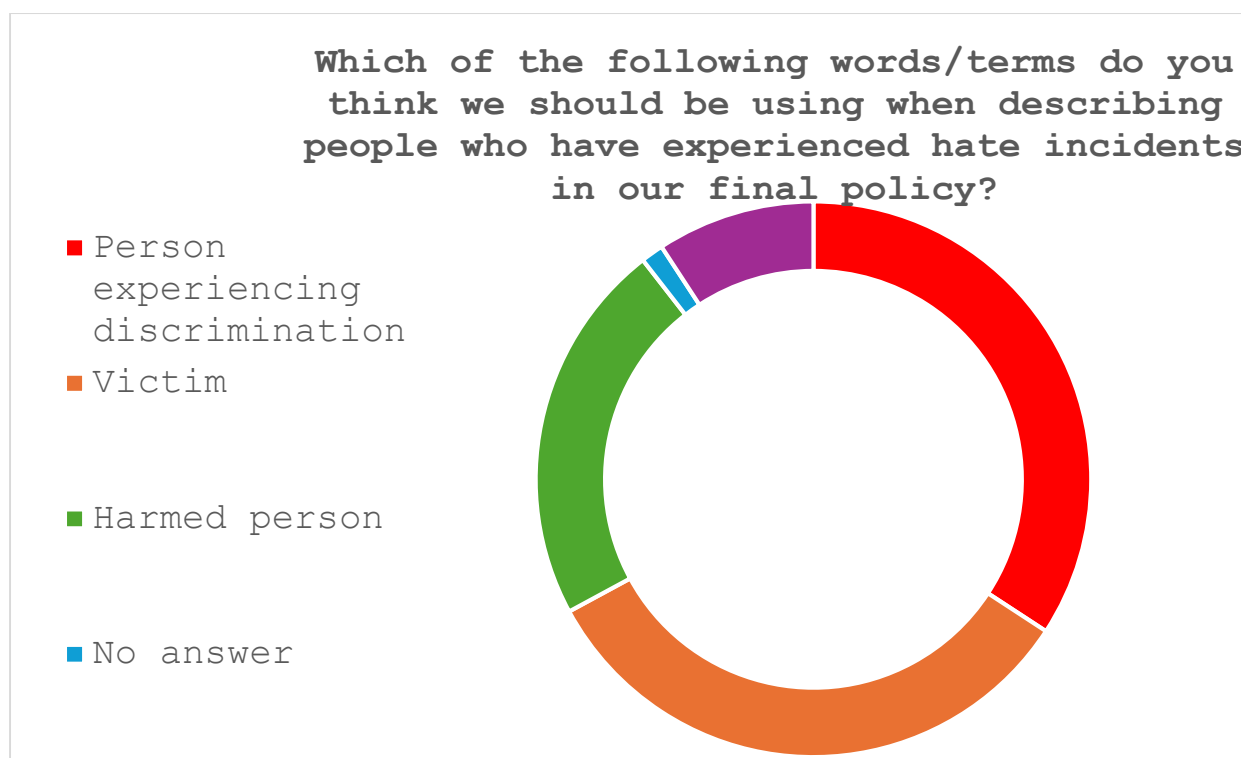
### Suggestions on how Housing can improve

Question	Feedback
<i>Can you tell us more about how we can improve promoting awareness of what action we can</i>	<ul style="list-style-type: none"> <li>• Publicising actions taken against perpetrators to increase confidence amongst victims of hate incidents to report to Housing</li> </ul>

<p><i>take in response to hate incidents?</i></p>	<ul style="list-style-type: none"> <li>• Raise awareness via Homeing In publication, notices on buses and notice boards, talks in schools and community gatherings, letters to all tenants and via the Community Engagement Team</li> <li>• Clear and tangible consequences for perpetrators, including eviction</li> <li>• Remind all tenants of terms of tenancy agreement</li> <li>• Ensure information is accessible, provided in a variety of formats and languages</li> <li>• Use an independent organisation or person to check that documents and policies are accessible for residents with learning disabilities</li> <li>• Better training for staff</li> <li>• Expand the definition of hate beyond protected characteristics</li> <li>• More proactive, transparent and consistent actions by Housing to address hate incidents</li> <li>• Better communication to ensure residents are aware of both the issues and the actions being taken</li> </ul>
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### 3.5 Policy wording.

Respondents were also asked which words/terms they thought we should be using when describing people who have experienced hate incidents in our final policy. They could choose more than one preference from a list of words/terms. The most chosen was 'Person experiencing discrimination', chosen by 34.2% of respondents, followed by 'Victim' (32.9%) and 'Harmed Person' (22.4%) and 9.2% selected that they would like to use another unspecified word/term.



One respondent added that using the word victim may put people off reporting as it is seen as “weak” and disempowering.

### 3.6 Anything else.

Almost half of respondents (27/57) gave further feedback when asked whether there is anything else we should consider when writing the final policy.

Question	Feedback
<i>Is there anything else we should consider when we write the final policy?</i>	<ul style="list-style-type: none"> <li>• Offer other remedies in cases where the perpetrator can’t be identified, to ensure that people feel that they are believed and supported.</li> <li>• Several respondents called for stronger action against perpetrators, with eviction as a potential consequence for repeat offenders.</li> <li>• Several responses called for clear support mechanisms, including protection for anonymous witnesses and reassurances about what will happen following a report and any safeguards in place to keep them safe from further incidents.</li> <li>• Several respondents called for the definition to be widened, for</li> </ul>

	<p>example including age and domestic abuse.</p> <ul style="list-style-type: none"> <li>• Several respondents expressed concerns whether the policy would be followed by officers and highlighted the need to ensure officers are properly trained to respond to hate incidents.</li> <li>• Several respondents suggested learning best practice from other organisations, particularly those who support groups who are more likely to experience discrimination.</li> <li>• Several respondents highlighted the importance of referring people facing discrimination to relevant support.</li> <li>• Information on crime within the area to be made available to Homemove applicants bidding on properties.</li> </ul>
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### 3.7 In person sessions

Two in person sessions were held at Brighton Town Hall on 29 October 2024. Although eight residents registered to attend, just two attended.

Key points captured during these sessions include tailoring communication methods, promoting awareness of how to report hate incidents, taking a victim centred approach, ensuring that harmed person's needs remain in focus when working with perpetrator's with vulnerabilities and consideration as to whether tenants can be informed when individuals with known ASB histories are moved into their community.

### 3.8 Lived experience.

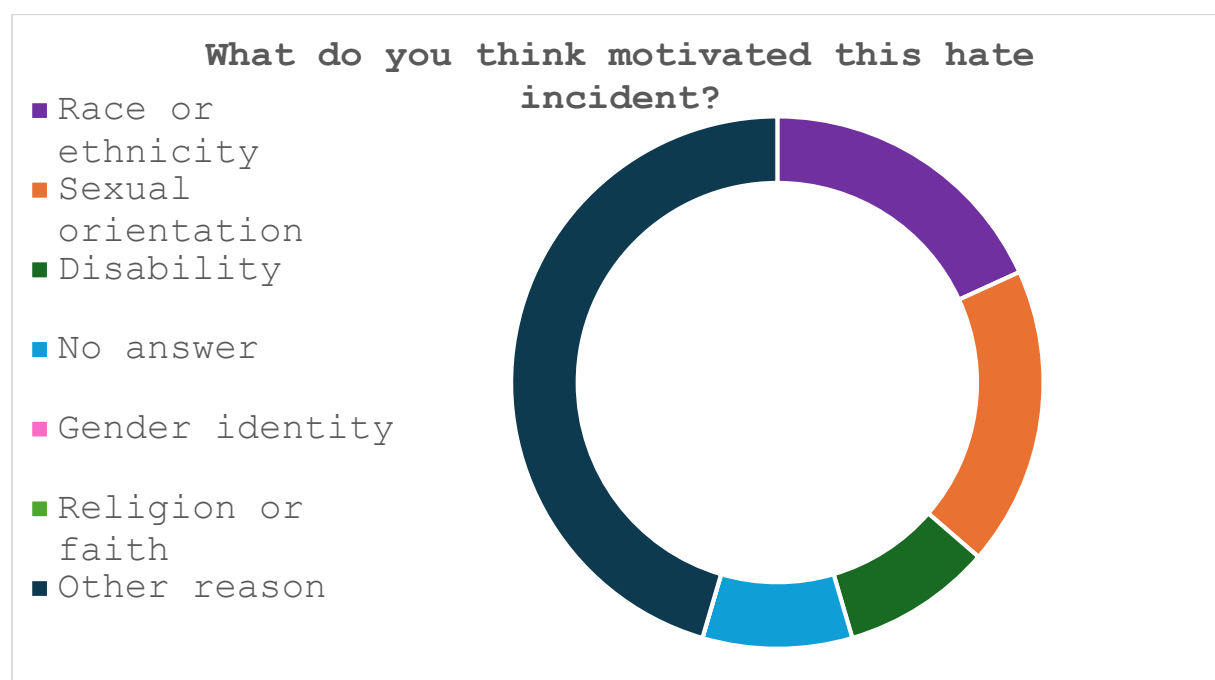
A significant number of respondents (20/57) answered that they would like to give feedback on their response of reporting a hate incident to Housing. However, 64.9% of these respondents did not select an option to provide feedback and we were therefore unable to contact them.

A sample of 11 tenants who had previously reported a hate incident in the last 18 months were also contacted to complete the survey.

A total of 9 respondents gave feedback on their experience of reporting a hate incident to Housing (2 via phone calls and 7 via an online survey). Although a small number of respondents completed the survey, their responses provide valuable feedback on Housing's response to hate incidents.

Whilst some respondents had a satisfactory experience, a significant number of respondents expressed dissatisfaction, citing lack of support, poor communication and inadequate response to complaints. Overall, respondents expressed a need for more empathetic responses from staff, better adherence to policies and improved support and communication for victims.

When asked what they thought motivated the hate incident, the most chosen option was 'other reason' (45.5%) followed by 'race or ethnicity' and 'sexual orientation; (18.2% each) and 'disability' (9.1%). None chose the options 'gender identity' and 'religion or faith' and 9.1% chose not to answer.

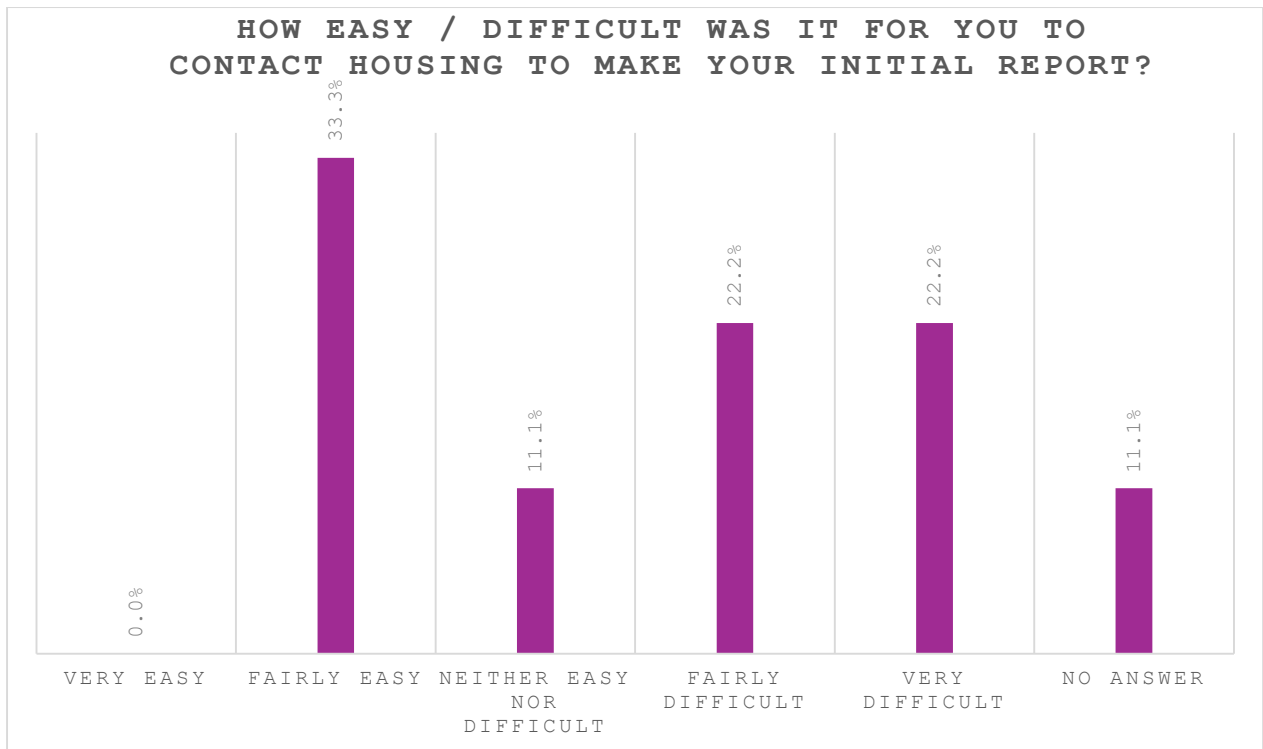


## Reporting hate incidents to Housing.

### *How easy / difficult was it for you to contact Housing to make your initial report?*

When asked how easy or difficult it was for them to contact Housing to make their initial report, 44.4% said it was either 'very difficult' or 'fairly difficult' (22.2% each), a third of respondents (33.3%) said it was 'fairly easy' and none that it was 'very easy.' However, a sizeable minority (22.2%) did not answer the question or said they didn't know.





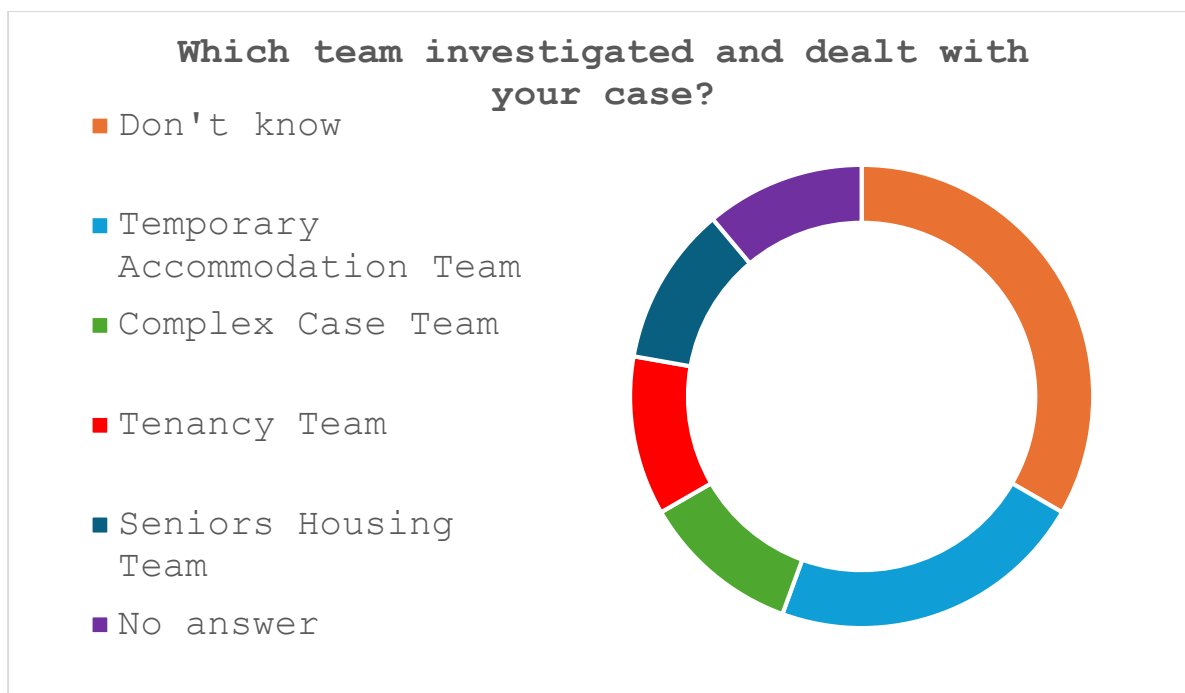
## Suggestions on how Housing can improve

6/11 of respondents suggested improvements to make the reporting of hate incidents to Housing easier.

Question	Feedback
<i><b>Is there anything we could have done to make reporting easier?</b></i>	<ul style="list-style-type: none"> <li>• Reasonable changes to accommodate people with disabilities, including learning disabilities</li> <li>• Direct line to staff experienced in handling hate incidents</li> <li>• Staff taking phone calls to be polite and friendly</li> <li>• Sending letters to all residents in a building</li> </ul>

## ***Which team investigated and dealt with your case?***

Respondents were also asked which Housing team investigated and dealt with their case: 44.4% said they didn't know (33.3%) or gave no answer (11.1%) leaving 55.6% who specified a team: 22.2% answered 'Temporary Accommodation Team' followed by 11.1% each for the 'Complex Case Team', 'Tenancy Team' and the 'Seniors Housing Team.'



## Being treated fairly & with respect.

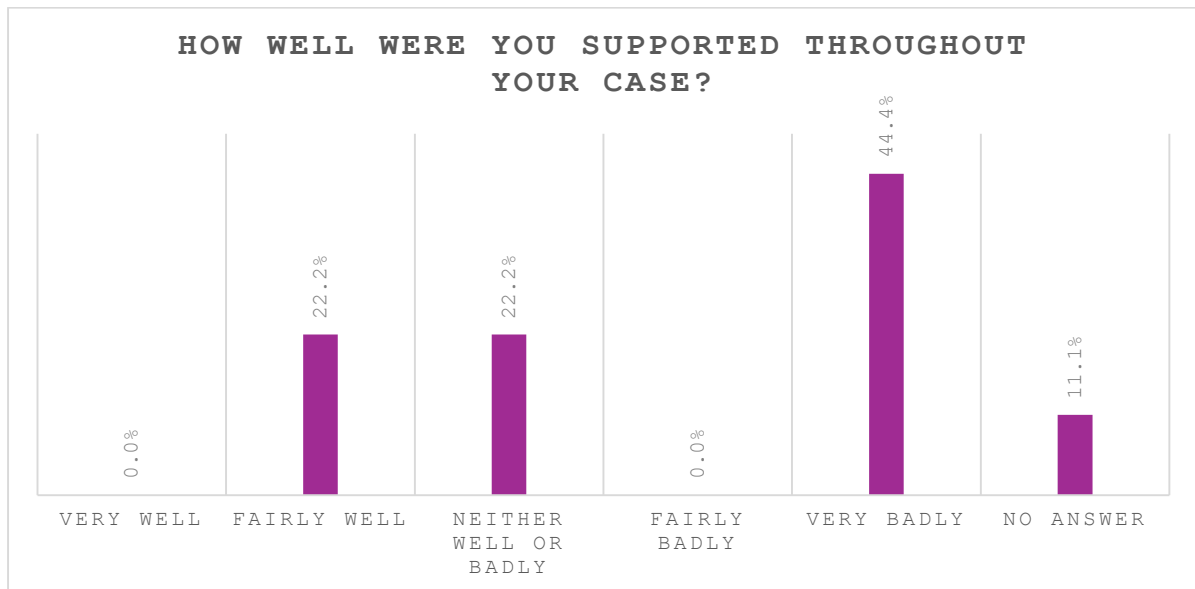
7 respondents gave their feedback and overall reported mixed experiences with council housing when reporting hate incidents. Whilst 2 respondents felt they were treated with respect and fairly, others had negative experiences, including feeling discriminated against by council officers or feeling let down by the service, with no follow-up after reporting serious incidents.

Question	Feedback
<b><i>We value your input on our services. In your experience, how well did the council handle your report of a hate incident? Did you feel you were treated fairly and with respect throughout the process?</i></b>	<ul style="list-style-type: none"> <li>One respondent who had made more than one report, had a positive experience, however, later felt discriminated against by staff when making a subsequent report.</li> <li>One respondent felt the council ignored bullying and intimidation by tenants and shared confidential information.</li> <li>"No I did not feel that way. I was sent around to various people. There wasn't a clear method, contact or process to report hate incident nor what would happen after"</li> </ul>

## Supporting victims.

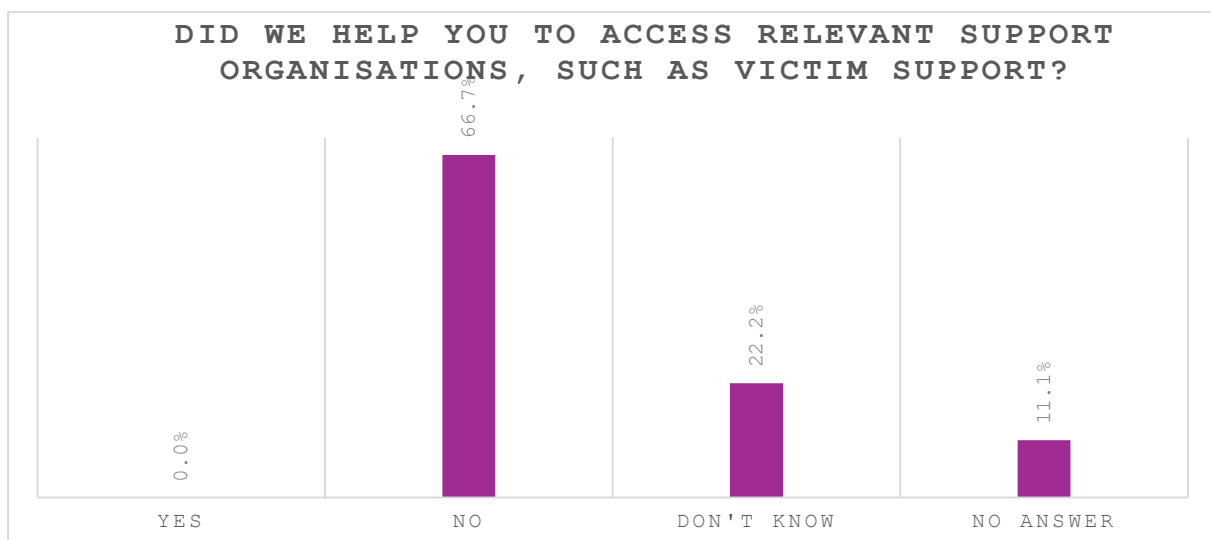
### ***How well were you supported throughout your case?***

When respondents were asked how well they were supported throughout their case, 44.4% said 'very badly', 22.2% said 'fairly well' and 22.2% said 'neither well or badly.' None answered 'very well' or 'fairly badly' and 11.1% gave no answer.



### ***Did we help you to access relevant support organisations, such as Victim Support?***

Two thirds of respondents said 'no' when asked if they were helped to access relevant support organisations, such as Victim Support. None answered 'Yes' and the remainder said they didn't know (22.2%) or gave no answer (11.1%).



### **Suggestions on how Housing can improve**

Whilst 2 respondents stated that there was nothing more that Housing could have done to make them feel more supported, 5 respondents gave suggested improvements for how Housing can support residents who have experienced hate incidents. A common issue was the lack of updates provided by Housing, in addition to a lack of explanation regarding the actions taken.

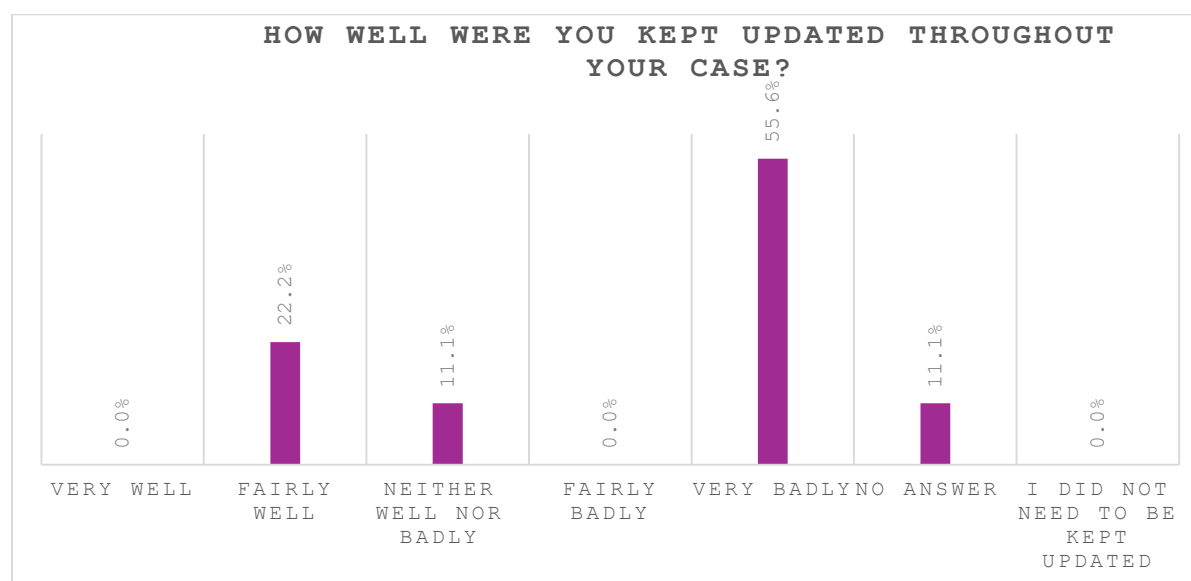
Access to relevant support organisations such as Victim Support was generally not provided, which contributed to feelings of being unsupported.

Question	Feedback
<b><i>Is there anything we could have done to make you feel more supported?</i></b>	<ul style="list-style-type: none"> <li>• Staff to follow council policy for anti-social behaviour (ASB)</li> <li>• Carry out risk assessments</li> <li>• Return calls and emails</li> <li>• Clearer communication and listening to victims</li> </ul>

## Keeping residents informed.

### ***How well were you kept updated throughout your case?***

When asked how well they were kept updated throughout their case, a majority of respondents (55.6%) said 'very badly', 22.2% said 'fairly well' and 22.2% said 'neither well or badly.' None said 'very well' or 'fairly badly' and 11.1% gave no answer.



## Suggestions on how Housing can improve

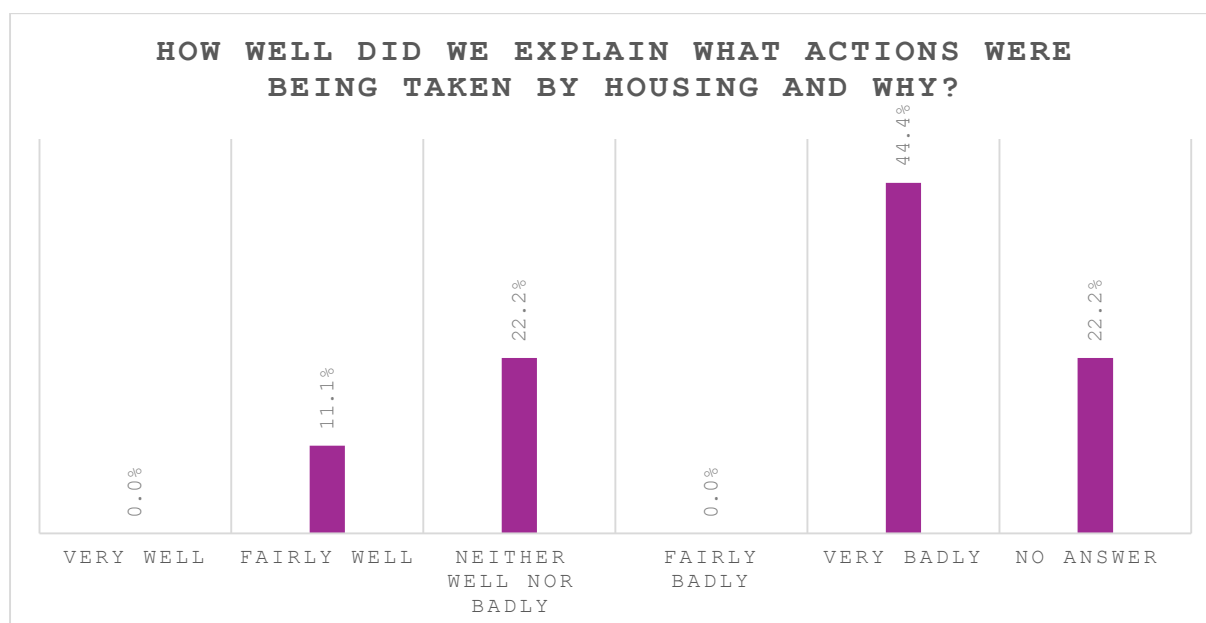
Whilst 1 respondent answered that there was nothing Housing could have done better, 6 respondents gave suggested improvements for Housing to keep residents updated on their case.

Question	Feedback
<i><b>Is there anything we could have done better to keep you updated?</b></i>	<ul style="list-style-type: none"> <li>• Staff to ensure victims are aware of any visits to the perpetrator</li> <li>• Maintain agreed contact arrangements</li> <li>• Provide a named point of contact in Housing</li> <li>• Provide updates on request</li> </ul>

## Taking appropriate action.

### ***How well did we explain what actions were being taken by Housing and why?***

Similarly, respondents were asked how well Housing explained what actions were being taken and why, with the same set of response options: 44.4% answered 'very badly' followed by 22.2% 'neither well nor badly' and 11.1% 'fairly well.' None said 'very well' or 'fairly badly' and 22.2% gave no answer.

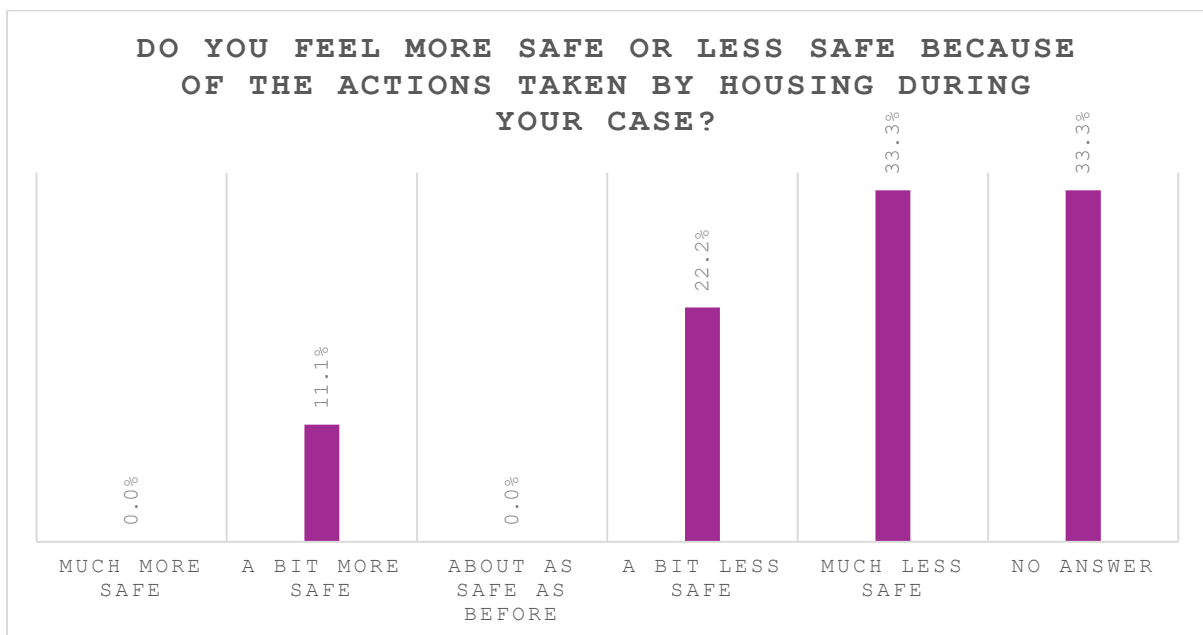


## Suggestions on how Housing can improve

Whilst 1 respondent stated that there was nothing more that Housing could have done to better explain actions taken and 1 respondent stated that no action was taken, 3 respondents gave further feedback on ways Housing can better explain any action taken.

Question	Feedback
<i>Is there anything we could have done to better explain what action we were taking and why?</i>	<ul style="list-style-type: none"> <li>Proactive communication and not waiting for victim to chase for updates</li> <li>"Provide a timeframe of how long things would take...respond to the ...within a reasonable timeframe preferably 1-3 days"</li> <li>Ensure additional follow up contact is made with victim following reports of serious incident</li> </ul>

Respondents were then asked whether they feel more safe or less safe because of the actions taken by Housing during their case. Most respondents (55.5%) answered either 'much less safe' or 'a bit less safe' (33.3% and 22.2% respectively) and 11.1% answered 'a bit more safe.' None answered 'much more safe' or 'about as safe as before' and 33.3% gave no answer.



### Suggestions on how Housing can improve

6 respondents gave further feedback on how Housing could have made their overall experience better.

Question	Feedback
	<ul style="list-style-type: none"> <li>Provide a professional and caring response</li> </ul>

<b><i>Is there anything we could have done to make your overall experience better?</i></b>	<ul style="list-style-type: none"> <li>• Respond within a reasonable timeframe</li> <li>• Take action</li> <li>• ASB officers to carry out visits to witness problems</li> <li>• Offer in person ASB surgeries</li> <li>• Dedicated community support officer available for residents to speak to in person</li> </ul>
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## 4. Consultation outcome.

A workshop was held with service managers in February 2025 to review and discuss how to implement key consultation feedback in the final policy. Managers were asked to consider how ensure the policy meets the following objectives:

1. Ensuring persons impacted by hate feel supported and treated fairly & with respect
2. Ensure that persons harmed by hate are kept updated and understand any actions taken by Housing
3. Persons impacted by hate incidents understand the definition of hate incidents or crimes & know how to report them in a safe way

The tables below set out how we plan to take forward these key issues and how we have considered the suggestions of residents. We are not able to respond to every point made within this report, but the responses received have been used to inform the final policy and shared with relevant council officers to improve our service.

Key findings from consultation	Our response
<b>44.4% of respondents to lived experience survey felt they were supported very badly throughout their case.</b>	<p>We'll be introducing an individual action plan to all hate incident cases, regardless of level of risk. These will be overseen by our Complex Case and Temporary Accommodation Managers.</p> <p>Our Senior Oversight role will ensure that:</p> <ul style="list-style-type: none"> <li>• A single point of contact is provided</li> <li>• Full range of communication methods, including WhatsApp, are offered</li> </ul>

	<ul style="list-style-type: none"> <li>• Communication preferences are recorded, including method &amp; frequency as agreed with the victim</li> <li>• The victim has been asked what they would like to happen</li> <li>• Support referrals (including Victim Support) are offered</li> <li>• Standard letters (or alternatives) are used to ensure any actions are fully understood</li> <li>• Victims are offered the opportunity to feedback on their experience via case closure surveys</li> <li>• Staff receive refresher training on victim &amp; witness service standard</li> <li>• Consistent actions are taken across Housing to address hate incidents</li> </ul> <p>We are updating our current Housing Management IT system to support the action plan process and improved categorisation of hate incident cases, enabling better oversight.</p> <p>We have increased our capacity within the tenancy team to deal with anti-social behaviour across the city. The increase resource looks to provide more focus on supporting victims and an increased ability to manage the demand and provide good outcomes and resolutions.</p>
<p><b>Two thirds of respondents felt that the council isn't doing enough to promote awareness of actions that can be taken in response to hate incidents.</b></p>	<p>We'll look to publish case studies around hate incident case outcomes and the difference this has made to our residents.</p> <p>We will ensure staff are trained so that they are confident in explaining the actions available to Housing and are clear on information sharing.</p> <p>We will review our standard letters to ensure they are clear, including the letter sent on the opening of cases explaining potential actions by Housing.</p>



	We will ensure that advocacy is built into the procedure and offer the option of keeping a nominated representative informed.
<b>A sizeable minority (21.1%) felt it is not clear how to report a hate incident to Housing.</b>	<p>We'll review the information on the Brighton &amp; Hove City Council website and look to do further promotion, including an article in Homing In, posters and promoting awareness via community groups.</p> <p>We will work with Brighton Speak Out to ensure that information is accessible to residents with learning disabilities.</p>

<b>Customer recommendations</b>	<b>Our response</b>
<b>Clearer definitions within policy, particularly the differences between a hate incident and hate crime</b>	We have updated the definition within the policy and will ensure that the information on our website is reviewed.
<b>Written acknowledgement that incident has been logged</b>	We are looking into whether a reference number can be given to residents when they report an incident and we are reviewing our standard letters sent out once a case is opened.
<b>Improvements to the council's webpages, including creating a clear support link on the homepage for LGBTQ+ individuals to report hate crimes and ensuring all links are functional</b>	We'll review and update the information on the Brighton & Hove City Council website.
<b>Consideration of an advocate</b>	<p>We have added extra detail to the policy to ensure that residents are aware they can use advocacy and request that a nominated representative, such as next of kin or support worker is kept informed.</p> <p>We will ensure that the supporting procedure prompts staff to signpost to advocacy where needed.</p>
<b>Agreeing a victim contract (individual action plan) on frequency and method of contact to set expectations</b>	We'll be introducing an individual action plan to all hate incident cases, which includes frequency & method of contact as agreed with the victim. Victims will

	<p>have a named officer to contact to report any further incidents.</p>
<p><b>Importance of a victim centred approach, including a detailed action plan and ensuring actions align with the harmed person's desired outcome</b></p>	<p>Our initial assessment questions have been updated so that victims are asked "what would you like to happen?".</p> <p>As above, an individual action plan will be completed for all hate incident cases.</p>
<p><b>Stronger action against perpetrators, with eviction as a potential consequence for repeat offenders</b></p>	<p>We will be victim centred in our approach and will take victims views into consideration when deciding what action to take, prioritising their safety and wellbeing. We will take action at the earliest opportunity.</p> <p>There is a clear legal framework we must follow before we can take enforcement action. This requires us to build a case, which includes evidence from witnesses and demonstrates that the action we are taking is a proportionate response.</p> <p>This involves working with perpetrators to address the underlying causes of the behaviour, with the aim of stopping the incidents from continuing.</p> <p>The consequences of continuing hate behaviour is made clear to perpetrators. If someone has been offered support but does not engage and their hate behaviour continues, we will take enforcement action. This may include applying to court for possession of their home.</p> <p>Where eviction is not an option, we will seek to explore alternative legal remedies such as injunctions.</p> <p>Housing Officers will receive ongoing refresher training on legal tools and powers and how to work with perpetrators with vulnerabilities. Officers will also receive training on explaining processes and gathering evidence.</p>

<b>Use an independent organisation or person to check that documents and policies are accessible for residents with learning disabilities</b>	We will be working with SpeakOut Brighton to ensure that the policy is accessible for residents with learning disabilities.
<b>Ensure information is accessible, provided in a variety of formats and languages</b>	<p>We will provide information in languages other than English and information in alternative formats including braille, large print, easy read and audiotape.</p> <p>Alternatives to written incident diary sheets, such as the use of voice recording technology will be offered.</p> <p>We will provide support with translation.</p>
<b>More proactive, transparent and consistent actions by Housing to address hate incidents</b>	<p>We are expecting that the introduction of the senior oversight role will ensure more proactive, transparent and consistent actions by Housing to address hate incidents.</p> <p>The senior oversight role will include monitoring of live cases, reviewing case closure surveys, an annual review of case outcomes and responsibility to oversee training, which is expected to improve Housing's response addressing hate incidents.</p>
<b>When asked about policy wording, 34.2% of respondents preferred 'Person experiencing discrimination', followed by 'Victim' (32.9%)</b>	With such a close margin between the two terms 'person experiencing discrimination' and 'victim', we have decided to keep using 'victim'. This is in line with other policies and to ensure the policy is widely understood by all, including residents with learning disabilities.
<b>Information on crime within the area to be made available to Homemove applicants bidding on properties &amp; residents to be informed when individuals with known ASB histories are moved into their area</b>	<p>If someone is moving under a priority transfer due to hate incidents and is offered a property, we will look to offer the option of viewing hate crime statistics for the area.</p> <p>We are not able to inform residents when individuals with known ASB histories are moved into their area due to data protection.</p>

	Residents are able to access information on crime within the area via the Sussex Police website <a href="#">Your area   Sussex Police</a> .
<b>Ensure officers are properly trained to respond to hate incidents</b>	<p>We will be organising training and briefings to ensure that staff recognise hate incidents, know how to respond and take action in line with our policy.</p> <p>This includes the following frontline teams, Housing Customer Services, Tenancy Services, Temporary Accommodation, Tenancy Sustainment Team, Housing Income Management, Repairs &amp; Estates.</p>
<b>Option to report anonymously &amp; reassurance for victims &amp; witnesses about how information will be stored and used</b>	<p>We have added extra detail to the policy, including a link to the new <a href="#">privacy notice</a> which explains how information is collected, used and shared.</p> <p>We have also added that it is possible to make an anonymous report online via the council's website, however it is likely that we will be limited in the actions we can take and will not be able to share any updates with the reporter.</p> <p>We have included further information on how to report to third party organisation, True Vision.</p>

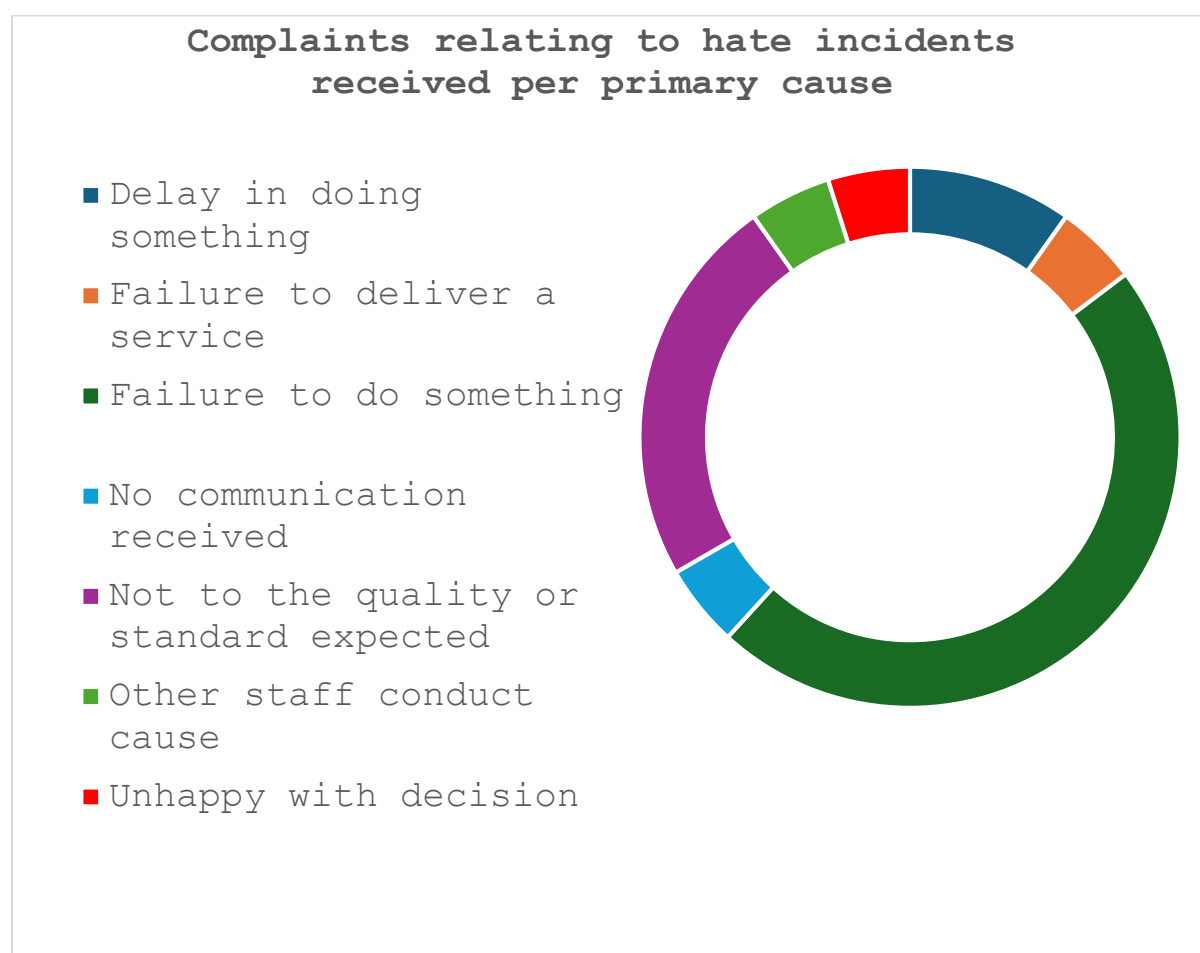
## 5.Next steps.

A final draft of the Hate Incident Policy and accompanying equality impact assessment will be signed off by the Corporate Director for Homes & Adult Social Care in consultation with the lead member for Housing following the council's Overview & Scrutiny Committee in September 2025. It is anticipated that the policy will be fully implemented by March 2026.

## Appendix A: Analysis of Stage 1 Complaints

Stage 1 complaints between 2019 – 2023 were reviewed as part of the process creating the draft policy. The sample consisted of both partly upheld (38%) and cases that were not upheld (62%).

When looking at Stage 1 complaints relating to the handling of hate incidents cases, the majority of primary causes were due to failure to do something (48%). This is followed by complaints where it was not to the quality or standard expected (24%) and a delay in doing something (10%). The lowest proportion of complaints were due to a failure to deliver a service (5%), no communication received (5%), other staff conduct cause (5%) and unhappy with decision (5%).



## Appendix B: Main consultation questions

(Saved as a separate PDF doc)

## Appendix C: Lived experience survey questions

(Saved as a separate PDF doc)

## Appendix D: Equalities Information

A range of questions were asked to profile the respondents, ahead of the equalities monitoring questions:

- 91.2% were responding as an individual and 8.8% on behalf of a group or organisation.

- The three most common postcode areas respondents gave were BN1 1 (12.3%), BN2 9 (8.8%) and BN2 0 (8.8%).
- A majority of 56.1% answered that the type of housing they lived in was 'Council housing (including leasehold)' followed by 'Owner Occupier' (12.3%), Private rented housing (10.5%) and 'Temporary or emergency accommodation, including Seaside Homes (5.3%).'.

Respondents were asked whether they wanted to answer the equalities monitoring questions, of which 58% answered 'Yes' with the remainder choosing 'No' or not answering. Of those who chose they would answer these questions:

- **Age:** 32% were 55 or over and 26% were under 55 (42% did not answer)
- **Physical or mental health conditions or illnesses lasting or expected to last 12 months or more:** 46% 'Yes' followed by 11% 'No' and 3% 'Prefer not to say' (40% did not answer). As a follow up question, respondents were asked whether any of their conditions or illnesses reduce their ability to carry out day to day activities: 28% chose 'Yes, a little' followed by, 'Yes, a lot' (16%) and 'No' (1%) (54% did not answer). There was also an option to select one or more specific conditions or illnesses, those most chosen in order included: The two categories which 5% or more of respondents selected were long-term physical illnesses or health conditions (15%), mental health differences (14%), physical differences substantially limiting basic activities (9%) and learning differences (6%).
- **Ethnic origin:** although 42.2% did not answer, the most commonly selected categories otherwise were 'White: English, Welsh, Scottish, Northern Irish, British' (35.1%), 'White: Other' (7%), 'Asian / Asian British: Indian' (3.5%) and 'Mixed: any other mixed / multiple ethnic background' (3.5%). There were several other ethnic groups chosen by one respondent each (1.8% of respondents) including 'Other Ethnic Group: Arab', 'Mixed: Black Caribbean and White', 'Mixed: Asian and White', and 'Black / Black British: African.'
- **Religion, faith or belief:** other than those who didn't answer (42.1%) the most common categories selected were: 'No religion' (24.6%), 'Christian' (15.8%), 'Muslim' (3.5%), 'Spiritual' (3.5%) and 'Another religion, faith or philosophical belief.' There were several other categories chosen by one respondent each (1.8% of respondents): 'Agnostic', 'Buddhist', 'I do not follow any faith, religion or belief.'
- **Gender:** the most common answers were 'Female' (29.8%), 'Male' (26.3%), 'Prefer not to say' (1.8%) and 'Prefer to self describe' (1.8%) and 40.4% gave no answer. Respondents were also asked whether they consider themselves trans or have a trans history, to which 3.5% selected 'Yes', 54.4% 'No', 1.8% 'Prefer not to say' (40.4% gave no answer).
- **Sexual orientation:** other than those who gave no answer (40.4%) the most commonly selected answers were 'Heterosexual or straight' (26.3%), 'Gay' (14%), 'Prefer not to say' (7%) and 'Asexual' (5.3%). There were several other

sexual orientations chosen by one 1.8% of respondents each including 'Bisexual or Bi', 'Lesbian', 'Queer' and 'Prefer to use another term'.

## **Appendix E: Groups and organisations who submitted a consultation response**

Sussex Police

Victim Support

Hampshire Court resident

Brighton & Hove City Council

## **Appendix F: List of External Stakeholders**

The consultation was shared with the following groups and organisations, who were invited to submit a response and share amongst their communities:

### **Local organisations**

1. Across rainbows
2. A seat at the table
3. Amaze Sussex
4. African Centre for Development and Research
5. Area Panel members
6. Black & Minority Ethnic Community Partnership (BMECP)
7. Bodhisattva Kadampa Meditation Centre
8. Bridging Change
9. Brighton Black Anti Racism Community Organisation (BARCO)
10. Brighton & Hove Faith in Action
11. Brighton & Hove Housing Coalition
12. Brighton & Hove Interfaith Contact group
13. Brighton & Hove Jewish Community
14. Brighton & Hove Jewish Welfare Board
15. Brighton & Hove LGBT Switchboard
16. Brighton & Hove Muslim Forum
  
17. Brighton & Hove Muslim Women's Group
18. Brighton & Hove Older People's Council
19. Brighton & Hove Workers Forum
20. Brighton & Hove Yemeni Community Association
21. Brighton & Hove Youth Council
22. Brighton Advice Centre
23. Brighton Housing Trust (BHT)
24. Brighton Unitarian Church
25. Brighton Women's Centre
26. Brighton YMCA

27. Carers Centre
28. Carousel
29. Change Grow Live
30. Chapel Royal
31. Chinese Educational Development Project
32. Citizens Advice (Brighton & Hove)
33. Conversation Over Borders
34. Emmaus
35. Fresh Youth Perspectives
36. Friends, Families and Travellers
37. Grace Eyre Foundation
38. Hangleton & Knoll project
39. Hove Hebrew congregation
40. Just life
41. Leaving Care Team
42. mASCot
43. MindOut
44. Mosaic Black Asian and Mixed Parentage Family Group
45. Multicultural Group Brighton & Hove
46. Network of International Women for Brighton & Hove
47. Oromo Community in Brighton & Hove
48. Possability People
49. Racial harassment forum Brighton & Hove
50. Radical Rhizomes
51. Refugee Radio
52. Rise
53. rYico
54. Sanctuary on Sea
55. Sikhs of Sussex
56. Speak Out Brighton & Hove
57. SSAFA Sussex
58. St Luke's Prestonville
59. Sudanese Coptic Association
60. Sussex Friends of Israel
61. Sussex Indian Punjabi Society
62. Sussex Police hate crime lead
63. Tenant & Residents Associations
64. The Clocktower Sanctuary
65. The Ledward Centre
66. The Migrant English Project
67. The Rainbow Hub
68. Trans Pride Brighton
69. Trust for Developing Communities
70. The Wellbeing Hub at Preston Park
71. University of Sussex BAME staff network
72. QTIPoC Narratives



73. Voices In Exile
74. Women of colour Brighton
75. Youth Advice Centre (YAC) Brighton
76. Writing our legacy

### **Resident & community groups:**

1. City Point Residents Association
2. North Laine Community Association
3. Sylvan Hall Residents Association
4. Wiltshire House Residents Association
5. Friends of Brighton and Hove Hospital
6. Kingscliffe Society Newsletter
7. Patch News
8. Preston Pages
9. Queens Park Living
10. Roundhill Reporter
11. Turner News
12. Warwick Mount Residents Association
13. Withdean and Patcham Magazine
14. Exeter Street Hall Community Centre
15. Aging Well Mailouts
16. BHFCP, Our Voice
17. Bricycles
18. Brighton & Hove Magazines (Commercial)
19. Brighton & Hove Organic Gardening Shop
20. Gscene
21. Leaseholders Action Group
22. Sussex ME Society
23. The Pensioner
24. U3A Brighton & Hove
25. Marina Local Action Team
26. Robert Lodge Community Space Group
27. Due East
28. Saltdean Residents Association
29. Woodingdean News
30. Woodingdean Tenants and RA Newsletter
31. Moulsecoomb Local Action Team
32. Patcham Local Action Team
33. Bevendean Bulletin
34. Friends of Blakers Park
35. Hollingdean News
36. Moulsecoomb & Bevendean LAT
37. Highcroft Lodge Residents Association
38. Brunswick and Adelaide Local Action Team
39. Philip Court Residents Association

- 40. Portslade Local Action Team
- 41. Portslade Village Green Residents Assoc
- 42. West Hove Forum
- 43. Clarendon and Ellen RA
- 44. Hangleton Harbinger
- 45. Hove Park Living
- 46. Knoll Scroll
- 47. Portslade Community Forum
- 48. The Scroll
- 49. West Hove Directory

## Version Control

Version	Date	Author	Changes
1.0	3 July 2025	Helen Burrow	Final draft report created to share with HLT
1.1	9 July 2025	Helen Burrow	<ul style="list-style-type: none"> <li>Added “Housing” to references of Hate Incident Policy in title &amp; within Executive summary</li> <li>Exec summary - added acknowledgement of the contributions of residents to consultation in first line</li> <li>Exec summary – “increased staffing within Tenancy Services” updated to “We have increased staffing within the Tenancy Team in 2025”.</li> </ul>

			<ul style="list-style-type: none"> <li>• Exec summary - Removed Repairs &amp; Estates from “Refresher training for all customer facing Housing teams” (and added customer facing)</li> <li>• Consultation outcome – added individual action plan in brackets after victim contract.</li> <li>• Consultation outcome – added “We will be victim centred in our approach and will take victims views into consideration when deciding what action to take, prioritising their safety and wellbeing. We will take action at the earliest opportunity” and minor rewording of following paras including “This involves working with perpetrators to address the underlying causes of the behaviour, with the aim of stopping the incidents from continuing. The consequences of continuing hate behaviour is made clear to perpetrators. If someone has been offered support but does not engage and their hate behaviour continues, we will take enforcement action. This may include applying to court for possession of their home.”</li> <li>• Consultation Outcome – added feedback on accessibility “Ensure information is accessible, provided in a variety of formats and languages” and our response “We will provide information in languages other than English and information in alternative formats including braille, large print, easy read and audiotape. Alternatives to written incident diary sheets, such as the use of voice recording technology will be</li> </ul>
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			offered. We will provide support with translation”.
1.2	5 Aug 2025	Justine Harris	<ul style="list-style-type: none"> <li>• Minor format changes</li> <li>• Updated implementation date to March 2026</li> </ul>